

**District Court of the United States
Southern District of New York**

(REDACTED),
Plaintiff
vs.
(REDACTED)
Defendants

Case No. 1:25-cv-01777-MMG

APPENDIX A

**FACTS OF REDACTED
and
REDACTED**

CONTENTS

REDACTED

NOTE: The Appendices are structured for reference by section, so that statements necessary to several sections may be repeated, causing some redundancy when several sections are read.

FACTS OF THE PLAINTIFF AND HIS CHARITY SCHOOL

1. Plaintiff (REDACTED) is an engineer, philanthropist, and President of Lenox School, Inc., a 501(c)(3) nonprofit corporation (hereinafter “School”), and more recently an institution of balanced policy debate, who devoted his life since 1982 to humanitarian causes. From 1982 he studied school foundings in their great variety, their varieties of administrative structures, and the typical causes of school failures. In 1989 he established Lenox School as a charitable college preparatory school that would sponsor about 3000 orphans in the developing nations as pen pals of the school students, to develop sympathy with other cultures among future leaders and professionals, and in 1992 purchased a small former college campus in Maine (“School property”), later donated to the school. Without organized opposition, the school would have opened in 2000 after renovations.

2. The school campus, 20 acres with 63,000 sq. ft. of dormitory and classroom buildings, donated free and clear by the plaintiff, was one of the best opportunities in the history of school founding, and was ready for initial opening by 2000. The plaintiff had studied the history of school foundings and closures, planned thoroughly for downsizing during recessions, and was able to provide basic expenses from his engineering income to assist the early growth phase. The development plan proceeded well, and without opposition the school would have opened in 2000 after initial renovations.

3. **REDACTED**

4. Beginning about 1996, local ATV users began using unmuffled ATVs on the adjacent nature trail, generating noise of 92 –112 dBA which forced litigation and delayed the School opening.¹

5. Upon publication of WTRM, local developers seeking the campus for apartment conversion aligned with backwoods hillbilly gangs motivated by REDACTED, causing endless gang vandalism attacks on the buildings and vehicles by day and night with axes, clubs, and arson, and by rifle attacks including 1500 rifle shots at the campus.² These defamations and violent attacks prevented the school from opening, ruining the lives of 7,200 orphans to date whom it would have supported and educated, and another 300 orphans annually. The crimes stopped abruptly two weeks after the School property was sold for other uses thirty years after purchase, when a regulation to prohibit such abuses was passed within two weeks.

6. REDACTED

6. The Plaintiff has worked constantly and lived in humble circumstances with no luxuries for four decades to achieve these purposes, all of which labors have been destroyed by the attackers of the school, REDACTED. Severe damages to the Plaintiff himself were caused, even beyond this deliberate, malicious, greedy, and perverse destruction of the principal labors, philanthropy, and purpose of his life. REDACTED.

FACTS OF REDACTED

REDACTED

Questions Raised By REDACTED

REDACTED

Background: REDACTED

REDACTED

¹ See (REDACTED). a fictionalized account of these attacks.

² Exhibit 150 map of gang attacks on the school campus.

OATH

I do solemnly swear that all statements of fact in the foregoing document are true and correct to the best of my knowledge and belief, and that a true copy thereof ~~has been~~ ^{SHALL BE} served as below to each defendant.

Date: 2/27/2025

(REDACTED)

Defendant Address List

(REDACTED)

Certificate

The above-named (REDACTED) appeared before me and stated that the foregoing document is his free act and deed.

Before me (REDACTED)